

# Cylchlythyr | Circular

## Consultation on HEFCW monitoring of institutional behaviour and performance regarding admissions for 2020/21

**Date:** 07 May 2020  
**Reference:** W20/13HE  
**To:** Heads and governing bodies of higher education institutions in Wales  
**Response by:** 01 June 2020  
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This circular provides a consultation on HEFCW's approach to monitoring admissions in order to maintain stability of the sector in response to the Covid-19 pandemic. Responses are requested by 1 June 2020.

We have stated elsewhere ([circular W20/11HE](#)) that we would not take forward any new HEFCW consultations or significant changes at this time. However, given developments in England, and the need to ensure that stability in admissions is maintained across borders, we considered it essential to issue this consultation.

This consultation applies to universities, rather than all regulated providers, as we anticipate that regulated providers delivering higher education under validation agreements will be subject to the terms of those agreements with their validation partners.

If you require this document in an alternative accessible format, please email [info@hefcw.ac.uk](mailto:info@hefcw.ac.uk).



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## Introduction

1. This circular provides a consultation on HEFCW's approach to monitoring admissions in order to maintain stability of the sector in response to the Covid-19 pandemic. Responses are requested by **1 June 2020**.
2. We have stated elsewhere ([circular W20/11HE](#)) that we would not take forward any new HEFCW consultations or significant changes at this time. However, given developments in England, and the need to ensure that stability in admissions is maintained across borders, we considered it essential to issue this consultation.
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## Background

4. Following the Covid-19 pandemic, a number of risks were identified regarding admissions, including the likelihood of international students either not being able to travel, or not wishing to travel, to undertake higher education (HE) in the UK. This is a substantial disruption to the admissions system. HEFCW is working to ensure that institutional behaviours regarding home and EU students do not further destabilise the sector in Wales.
5. On 23 March 2020 the Department for Education in England issued a moratorium to English institutions for a two week period, asking them not to change offers made to undergraduate students for the next two weeks. This was subsequently extended to 20 April, and later to 4 May 2020.
6. On 25 March 2020 the Welsh Government Minister for Education wrote to UCAS expressing concern about the potential risks associated with an increase in unconditional offers from higher education institutions to prospective students as a result of the current coronavirus outbreak. On 7 April Welsh Government issued a moratorium to institutions in Wales from making unconditional offers that were not in line with standard offers for those students who had not already gained the necessary qualifications. This ran to 1 May, and was subsequently extended to 4 May 2020.
7. On 8 April 2020 the Universities UK Board endorsed a [package of measures](#) to support universities across all four nations of the UK through the serious challenges posed by Covid-19. This included implementing a one year stability measure for admissions, with institutions in England and Wales in academic year 2020/21 recruiting UK and EU-domiciled full-time undergraduate new entrant students up to the total numbers they had forecast for those students in 2020/21 (plus 5% of the intake). This, and

other measures, were proposed in exchange for additional funding support from UK Government.

8. At the end of the moratorium, the Department for Education in England subsequently announced the [implementation of measures](#) including student number controls, noting the added discretion of the Education Secretary for England to allocate an additional 10,000 places on top of the controls, of which 5,000 would be allocated to students studying nursing or allied health courses. No additional funding was allocated to higher education in the announcement, although the profile of payments of funding from the Student Loans Company to HE providers was amended in response to the pandemic.
9. Concurrently the Office for Students (OfS) published a [consultation](#) on a new, time-limited, condition of regulation requiring a provider not to engage in any form of conduct which could reasonably have a material negative effect on the stability and/or integrity of the English higher education sector. This is proposed to be implemented retrospectively, from 11 March 2020, and to enable the OfS to impose penalties outweighing the financial benefit generated by the provider's changed recruitment strategy.
10. HEFCW has been working with Welsh Government and UCAS to monitor admissions. Following the end of the moratorium on certain behaviours in respect of admissions the Welsh Government Minister for Education published a Higher Education policy [statement](#), which included: 'It is proposed that Welsh higher education providers, with the Higher Education Funding Council for Wales (HEFCW), agree forecast numbers which will apply to UK and EU undergraduates. Post-graduates, part time students and international students will not be included in the measures. The Welsh higher education sector has contributed to the UK sector's proposals, and we are proposing measures, with HEFCW, that will ensure stability in the 2020 to 2021 recruitment round and which are fair to students' and 'HEFCW will monitor institutional performance and evaluate behaviour in relation to admissions to Welsh institutions, and will expect institutions to comply with the sector-wide agreement backed up by a statement of fair admissions practices developed by UUK.'
11. In the light of this we wrote to institutions asking them to continue to exercise constraint, while we developed the proposals provided in this consultation.

## **Admissions**

12. As work is underway to ensure that A level students receive fair grades that recognise their work prior to entering higher education, we have maintained the view that the usual admissions cycle should not be disrupted, and therefore different behaviours by institutions in relation to offers are not required. We recognise the autonomy of institutions in this

area, and therefore our engagement is from the perspective of aiming to maintain the stability of the Welsh sector.

13. HEFCW will monitor institutional performance and evaluate behaviour in relation to admissions to Welsh institutions, and will expect institutions to comply with any UK-wide approach that may be agreed.
14. We continue to engage with the Welsh Government in respect of financial support for the sector. The Welsh Government statement noted:  
'We recognise that the financial impact of the crisis on universities is substantial, and that further support from government may be required after institutions have done all they can to stabilise their financial position. We will continue to work within Welsh Government to identify options for further financial support for key sectors, including higher education, which will be vital for economic recovery, local and regional development, and a vibrant and informed democracy.'

### **HEFCW's Proposals**

15. We propose to implement a student number control for full-time undergraduate entrants, calculated on the basis of the higher of Higher Education Students Early Statistics (HESES) survey returns for 2019/20, 2018/19 intake numbers as confirmed in the End of Year Monitoring (EYM), or forecasts for 2020/21 provided in July 2019, plus 5%. The numbers will not include Initial Teacher Education, Nursing, and Allied Health Professions numbers, as these are subject to separate arrangements overseen by the Education Workforce Council and Health Education and Improvement Wales. Where we think that forecasts were based on assumptions that were not realistic at the time the forecasts were prepared, we will follow this up with institutions, to understand the details of those assumptions. We will provide universities with their individual calculations of the student number control to inform the consultation.

#### **Q1. Is the data which we propose to use to calculate a numbers control appropriate? Please explain.**

16. We propose to use UCAS data to monitor provider behaviour with regard to admissions practices, for example:
  - The use of unconditional offers
  - Reduction of tariffs for offers
17. We will look specifically at changes in these data following the implementation of the moratorium by Welsh Government.

#### **Q2. Is there any other information which we should monitor in order to maintain stability of the HE sector in Wales? Please explain.**

18. We recognise the financial pressures facing institutions in the context of Covid-19 and are working with Welsh Government to explore options for

additional resources. We will take account of institutions' adherence to the UUK fair admissions principles and our number control in our decisions for allocating any additional funding that is made available from Welsh Government and in monitoring the allocation of any additional funding.

**Q3. Are there any unintended consequences regarding the proposals in this consultation.**

**Q4. What positive or adverse effects will the policy have on:**

- a. **opportunities** for persons to use the Welsh language; and
- b. **treating** the Welsh language no less favourably than the English language.

**Q5. Could the proposals be changed to increase positive effects, or decrease adverse effects on:**

- a. **opportunities** for persons to use the Welsh language; and
- b. **treating** the Welsh language no less favourably than the English language.

**Q6. Do the proposals have any positive or negative impacts or unintended consequences in terms of equality and diversity and the Well-being of Future Generation (Wales) Act's seven wellbeing goals, Sustainable Development Principle and five ways of working?**

**Further information / responses to**

19. We will provide student number calculations in the week commencing 11 May 2020. In order for us to do this, you will need to provide us with the appropriate contact name and email address. For further information, contact Dr Cliona O'Neill (tel 029 2085 9731; email [cliona.oneill@hefcw.ac.uk](mailto:cliona.oneill@hefcw.ac.uk)). Responses to be received by **1 June 2020**.

**Assessing the impact of our policies**

20. We will carry out an impact assessment screening to help safeguard against discrimination and promote equality, including consideration of the impact of this consultation on the Welsh language, and Welsh language provision within the HE sector in Wales; impact on people with protected characteristics; and potential impacts towards the goals set out in the Well-Being of Future Generations (Wales) Act 2015 including our Well-Being Objectives. We will keep the impact of our policies under review. We are also working with UK organisations to inform our understanding of admissions implications and will take these into account.
21. Contact [equality@hefcw.ac.uk](mailto:equality@hefcw.ac.uk) for more information about impact assessments.